

CERTIFICATE OF SERVICE

DEBTOR 1 NAME: RODNEY CARL MOFFETT SR
DEBTOR 2 NAME: SHAKIRA RENEE MOFFETT

CASE NUMBER: 1443827

I Robert J Wallace, Jr. certify under penalty of perjury that I have served the attached document on the below listed entities in the manner shown on 6/15/2015 :

Via U.S. First Class Mail, or electronic service, if such interested party is an electronic filing user,
pursuant to Local Rule 2002-1, Fed. R. Bankr. P. 2002 and other applicable law.

RODNEY CARL MOFFETT SR, 8616 NE 116TH ST, KANSAS CITY MO 64157

By Electronic Transmittal :
By Fax :

I certify that I have prepared the Certificate of Service and that it is a true and correct copy to the best of my knowledge, information and belief.

Date : 6/15/2015

Signature : Robert J. Wallace, Jr.

Premium Graphics, Inc.
2099 Thomas Road Suite 10
Memphis, TN 38134

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

**In re: RODNEY CARL MOFFETT SR
SHAKIRA RENEE MOFFETT**

Case No.: 14-43827-abf-13

Debtors

MOTION TO DISMISS FAILURE TO MAKE PLAN PAYMENTS

Comes now Richard V. Fink, Chapter 13 Trustee, and moves to dismiss pursuant to 11 U.S.C. Section 1307(c) based on the following:

Current plan payment(s): Debtor 1: \$3,000.00 MONTHLY

Default in plan payments of \$9,000.00.
Payment due date is the 12th of the month.

Wherefore, the Chapter 13 Trustee moves the Court for an Order dismissing the above captioned case without prejudice.

June 12, 2015

Respectfully submitted,

/s/ Richard V. Fink, Trustee

Richard V. Fink, Trustee
2345 Grand Blvd., Ste. 1200
Kansas City, MO 64108-2663
(816) 842-1031

NOTICE OF MOTION

Any response to the motion must be filed within twenty-one (21) days of the date of this notice (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006) with the Clerk of the United States Bankruptcy Court. Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>. A copy of such response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. Parties not represented by an attorney may mail a response to the Court at the address below. If a response is timely filed, the Court will either rule the matter based on the pleadings, or set the matter for a hearing. If a hearing is to be held, notice of such hearing will be sent to all parties in interest. **If no response is filed within twenty-one (21) days (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006), this proceeding will be dismissed by separate Order of the Court.** For information about electronic filing, go to <http://www.mow.uscourts.gov>. If you have any questions about this document, contact your attorney.

Court Address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106

NOTICE OF SERVICE

The following parties will be served either electronically or by United States First Class Mail and a certificate of service will be filed thereafter:

DEBTOR(S)

TROPITO MILLER GRIFFIN LLC (461200) - ATTORNEY FOR DEBTOR(S)

/s/ Richard V. Fink, Trustee

CMA /Motion - Dismiss - Failure to Make Plan Payments